Case3:08-cv-01609-JSW Document88 Filed10/20/09 Page1 of 3

1	Neil A. Goteiner (State Bar No. 083524)		
2	ngoteiner@fbm.com Roderick M. Thompson (State Bar No. 96192)		
3	rthompson@fbm.com Thomas B. Mayhew (State Bar No. 183539)		
4	tmayhew@fbm.com Monali S. Sheth (State Bar No. 239511)		
5	msheth@fbm.com Farella Braun + Martel LLP		
6	235 Montgomery Street, 17th Floor San Francisco, CA 94104		
7	Telephone: (415) 954-4400 Facsimile: (415) 954-4480		
8	Attorneys for Defendants STRYKER ORTHOPAEDICS (AKA STRYKER		
9	ORTHOPEDICS; AKA STRYKER ORTHOPEDICS, INC.); HOWMEDICA		
10	∥ OSTEONICS CORPORATION: STRYKER		
11	CORPORATION; and STRYKÉR SALES CORPORATION		
12	UNITED STATES DISTRICT COURT		
13	NORTHERN DISTRICT OF CALIFORNIA		
14	SAN FRANCISCO DIVISION		
15			
16	CLAIRE C. HAGGARTY, individually	Case No. CV-08-01609-JCS	
17	and on behalf of all others similarly situated,	STIPULATION TO EXTEND DEADLINES	
18	Plaintiff,	IN CASE MANAGEMENT ORDER AND [PROPOSED] ORDER	
19	VS.		
20	STRYKER ORTHOPAEDICS, (aka STRYKER ORTHOPEDICS; aka		
21	STRYKER ORTHOPEDICS, INC.); HOWMEDICA OSTEONICS		
22	CORPORATION; STRYKER CORPORATION; and STRYKER SALES		
23	CORPORATION, and STRYKER SALES CORPORATION,		
24	Defendants.		
25			
26	Pursuant to Civil L.R. 6-1, 6-2 and 7-12, Plaintiffs Claire C. Haggarty (the "Plaintiff") and		
27	defendants Stryker Orthopaedics (aka Stryker Orthopedics; aka Stryker Orthopedics, Inc.),		
28	Howmedica Osteonics Corporation, Stryker Corporation, and Stryker Sales Corporation		
Farella Braun + Martel LLP 235 Montgomery Street, 17th Floor San Francisco, CA 94104 (415) 954-4400	Stipulation To Extend Deadlines In Case Management Order And [Proposed] Order, Case No. CV-08-01609-JCS	25094\2071169.1	

Case3:08-cv-01609-JSW Document88 Filed10/20/09 Page2 of 3

1	(collectively, the "Defendants," and collectively with the Plaintiff, the "Parties"), by and through		
2	their undersigned counsel, hereby respectfully request that the Court enter, and they hereby		
3	stipulate to the entry of, an order postponing by 30 days the trial date and corresponding pre-trial		
4	deadlines in the Stipulation and Order Re: Modified Schedule and Case Management Conference		
5	dated September 16, 2009 (Dkt No. 80). The 30-day postponement is necessary because new		
6	counsel has recently been substituted in for Defendants.		
7	In support of their request, the Parties rely on the Declaration of Counsel (Declaration of		
8	Monali S. Sheth In Support Of Stipulation To Extend Deadlines In Case Management Order),		
9	filed concurrently herewith.		
10	Dated: October 20, 2009 COTCHETT, PITRE & MCCARTHY		
11	COTCHETT, TITLE & MCCARTITI		
12	By: /s/ Niki Okcu		
13	Niki Okcu		
14	Attorneys for Plaintiff CLAIRE C. HAGGARTY		
15			
16	Dated: October 20, 2009 FARELLA BRAUN + MARTEL LLP		
17			
18	By: <u>/s/ Thomas B. Mayhew</u> Thomas B. Mayhew		
19	Attorneys for Defendants		
20	STRYKER ORTHOPAEDICS (AKA STRYKER ORTHOPEDICS; AKA		
21	STRYKER ORTHOPEDICS, INC.); HOWMEDICA OSTEONICS		
22 23	CORPORATION; STRYKER CORPORATION; and STRYKER SALES		
24	CORPORATION		
25			
26			
27			
28			
rtel LLP	Stipulation To Extend Deadlines In Case		

Farella Braun + Martel LLP 235 Montgomery Street, 17th Floor San Francisco, CA 94104 (415) 954-4400

Case3:08-cv-01609-JSW Document88 Filed10/20/09 Page3 of 3

Upon stipulation of the Parties and good cause shown, IT IS HEREBY ORDERED that Stipulation and Order Re: Modified Schedule and Case Management Conference dated September 16, 2009 (Dkt No. 80) is hereby vacated and that the trial date and corresponding pretrial deadlines are reset as follows:

December 2, 2009	Last date to amend pleadings
March 26, 2010	Date on which discovery on class will be complete
April 9, 2010	Last date for plaintiffs to file a motion for class certification
May 7, 2010	Last date for defendants to file opposition to plaintiffs' motion for class certification
May 21, 2010	Last date for plaintiffs to file reply brief in support of motion for class certification
June 7, 2010 June 11, 2010 at 9:00 a.m.	Last day to hear motion for class certification
August 23, 2010	Last date to complete fact discovery
September 20, 2010	Last date to file plaintiffs' expert reports
October 25, 2010	Last date to file defendants' expert reports
January 3, 2011 January 14, 2011 at 9:00 a.m.	Last day to hear dispositive motions
March 9, 2011 April 4, 2011 at 2:00 p.m.	Pre-trial Conference
March 30, 2011 April 25, 2011 at 8:00 a.m.	Trial

PURSUANT TO STIPULATION, IT IS SO ORDERED.

Counsel are admonisted to familiarize themselves with the Court's calendar and Standing Orders. The proposed dates do not conform with the Court's calendar for hearings.

DATED: October 21, 2009

United States District Judge

Farella Braun + Martel LLP 235 Montgomery Street, 17th Floor San Francisco, CA 94104 (415) 954-4400